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12-17-15

FILED

DEC 18 2015

**CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA

Plaintiff:

v.

Allison GILL

Defendant.

Magistrate's Case No.

COMPLAINT FOR VIOLATION OF
21 U.S.C. 952 and 960

Unlawful Importation of a Controlled Substance

15-3715

The undersigned complainant being duly sworn states:

COUNT I

On or about December 17, 2015, within the Southern District of California, defendant Allison GILL did knowingly and intentionally import approximately 6.34 kilograms (13.98 pounds) Methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Kayade Ereme
Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence, this 18th day of December, 2015.

~~United States Magistrate Judge~~

1 United States of America

2 V.

3 Allison GILL

4 PROBABLE CAUSE STATEMENT

5 On December 17, 2015, at approximately 01:40 a.m., a U.S. Customs and
6 Border Protection Officer (CBPO) was conducting operations at the Otay Mesa
7 Port of Entry (POE). The CBPO encountered GILL at Vehicle Lane seven (7)
8 driving a Mazda vehicle bearing California plates. GILL gave two (2) negative
9 customs declarations to the CBPO. The CBPO referred the vehicle for further
10 inspection due to inconsistencies with the U.S. passport that was presented by
11 GILL.
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13 A CBPO was assigned as the Z-Portal operator at the Otay Mesa Port of
14 Entry and screened the Mazda vehicle bearing California plates driven by GILL.
15 The CBPO Z-Portal operator noticed anomalies within the dash and rear quarter
16 panels of the vehicle.
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18 A CBPO working in the vehicle secondary lot was assigned to inspect the
19 Mazda vehicle bearing California Plates. Pursuant to the inspection, the CBPO
20 discovered ten (10) packages located in the vehicle's rear quarter panels and
21 dashboard. The CBPO probed a package which revealed a white crystal like
22 substance that tested positive for properties of methamphetamine. In total, ten (10)
23 packages of methamphetamine weighing approximately 6.34 kilograms (13.98
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1 pounds) were discovered within the vehicle. Three (3) packages were discovered
2 within the driver's side rear quarter panel, four (4) packages were discovered
3 within the passenger side rear quarter panel, and three (3) packages were
4 discovered within the dashboard.
5

6 At approximately 7:05 a.m., Homeland Security Investigations ("HSI")
7 Special Agents K. Ereme and M. Griffin interviewed GILL. GILL agreed to waive
8 her Miranda rights and speak with agents. During the interview, GILL stated that
9 she dropped an Unknown Female (UF) off before crossing the Otay Mesa Port of
10 Entry. GILL stated that she believed the UF had narcotics on her person. GILL
11 stated she was to cross the vehicle and pick up the UF that she had dropped off.
12 GILL stated she was to pick up the UF on the U.S. side of the border and they were
13 to drive to GILL's house where GILL was to exit the vehicle and the UF was to
14 take the car to an undisclosed location. GILL claimed she did not know anything
15 about the drugs in the vehicle. Department of Motor Vehicles records showed that
16 GILL is not the registered owner of the vehicle.
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18 GILL was arrested and charged with violation of Title 21 United States
19 Code 952 and 960, Unlawful Importation of a Controlled Substance. She was
20 booked into the Metropolitan Correctional Center, San Diego, CA.
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